

APPENDIX D



**Dust Control Plan
Bureau of Land Management**

**El Centro Field Office
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1.0 Introduction

Air quality is determined by many different factors, such as landforms, amount of contaminants emitted into the atmosphere, and meteorological conditions. In the Imperial Valley, stable atmospheric conditions, low mixing heights, and light winds during the morning and evening hours provide opportunity for dust and other contaminants to accumulate on the low-lying Imperial Valley floor. As a result, the Imperial Valley and all of Imperial County has been classified as a non-attainment area under the Environmental Protection Agency's PM₁₀ regulations as set forth in their Clean Air Act of 1990.

PM₁₀ is defined as: Any particulate material that exists as solid or liquid in the atmosphere. Particulate matter may be in the form of fly ash, soot, dust, fog, fumes, etc. Small particulate matter, or PM₁₀, is less than 10 microns in size (about one-eighth the diameter of a human hair) and is too small to be filtered by the nose and lungs¹. Fugitive dust is defined in rule 800 of the ICAPCD rules and regulations as: The Particulate Matter entrained in the ambient air which is caused from man-made and natural activities such as, but not limited to, movement of soil, vehicles, equipment, blasting, and wind.

The primary contributors of PM₁₀ under jurisdiction of the Bureau of Land Management El Centro Field office (ECFO) are Off Highway Vehicle Use (OHV), mining operations, geothermal energy operations and various short term construction projects such as installation of pipelines.

1.1 Purpose of Plan

The purpose of the Bureau of Land Management ECFO dust control plan is to identify sources of PM₁₀ emissions within our jurisdiction and identify dust control measures that can be implemented to help minimize or eliminate those emissions.

1.2 Document Organization

The remainder of this Plan is organized into the following sections:

Section 2.0 – Actions Requiring Controls
Section 3.0 – Dust Control Measures

2.0 Actions Requiring Control

2.1 Off Highway Vehicle Use

BLM lands are managed under the California Desert Conservation Area Plan, as amended (1980). OHV use is a popular form of recreation in Imperial County. An OHV is defined in the California Vehicle Code Division Provisions². There are four multiple use classes that the Bureau of Land Management employs in order to manage public lands. Lands falling under **Multiple Use Class C** are closed to all motorized vehicle activity. These lands are unavailable for motorized vehicle use and include areas designated by Congress as Federal

¹ www.raqc.org/more/define.htm

² 16.5 CVCD Chapter 1§ 38010

Wilderness Areas. Lands falling under **Multiple Use Class L** are classified as Limited Use areas. **Multiple Use Class M** is based on a controlled balance between higher intensity use and protection of public lands. In **Multiple Use Class L** and **M** travel is limited to existing open routes of travel only. In essence, only the trails or routes that are classified as open are allowed to be traveled on. The land in between these routes and trails is closed to vehicle use. Lands that fall under **Multiple Use Class I** are considered open areas. Multiple Use Class I is defined as: “Intensive Use.” Its purpose is to provide for concentrated use of lands and resources to meet human needs (California Desert Conservation Area Plan, 1980). This means that the entire area is open to all motor vehicles and all types of travel.

In addition to the Imperial Sand Dunes, Plaster City and Superstition Mountain open areas, the ECFO oversees lands in the East Mesa, West Mesa and Yuha Desert in BLM’s, Western Colorado (WECO) planning unit and the Indian Pass area in BLM’s North Eastern (NECO) planning unit. WECO and NECO are both limited use areas that fall under BLM Multiple Use Class L and M. Designated routes of travel are found in all of these regions and these are also popular areas for off highway enthusiasts to recreate. Located within Imperial County is the Imperial Sand Dunes Recreation Area, one of the largest OHV recreation areas in the United States. The Imperial Sand Dunes Recreation Area is located in eastern Imperial County with 83,252 acres open to OHV use, the Imperial Sand Dunes Recreation Area attracts hundreds of thousands of off highway enthusiasts each year. There are two other OHV Open Areas under BLM jurisdiction in Imperial County, Plaster City OHV Open Area and Superstition Mountain OHV Open Area, both located in western Imperial County. They are 28,240 and 14,723 acres, respectively. While these areas do not receive the same high visitation rates as the Imperial Sand Dunes Recreation Area, they are still popular recreation destinations for off highway vehicle use.

Off highway vehicle use contributes to PM_{10} emissions in a number of ways. Travel in open areas and along designated routes may contribute to particulate matter in the form of fugitive dust. Travel in open areas adversely affects vegetation by crushing and breaking up the vegetative cover, causing a reduction in the overall vegetative cover. This in turn leaves soils vulnerable to wind erosion and promotes further spreading of wind driven erosion as vegetative cover is reduced.

BLM law enforcement rangers actively patrol the lands under the ECFO jurisdiction. These patrols deter off route unauthorized OHV use. Rangers utilize verbal warnings, written warnings and citations to gain compliance. Reports of unauthorized OHV use suspected of generating PM_{10} in Limited Use Areas will be addressed on a case by case basis.

BLM ECFO Restoration Summary and Techniques

Since 2003 the Bureau of Land Management (BLM), El Centro Field Office has restored 751 closed routes and illegal impacts within Imperial County. The 751 restored areas which cover 65.89 miles with an area of 1,189 acres. Most of the miles of restoration are “line of sight” which means that the closed route or incursion was only restored to visual range. The remaining portion is left for natural restoration. Thus the total amount of area which has been restored is greater than the numbers presented. Techniques used by the BLM in conducting restoration projects are listed below:

Vertical/Horizontal Mulching:

Dead plant material placed at the beginning of closed routes, off of BLM-designated routes, can disguise these routes and deter additional vehicle traffic. Large down Ocotillo's and desert shrubs on the soil surface act as barricades. Similarly, dead shrubs or branches planted upright in the soil make the site blend in with surrounding vegetation. Vertical mulch also benefits restoration by trapping wind-blown seeds and lessening wind erosion just above the ground surface. This work shall be primarily done with hand tools. Little soil disturbance would be needed except where mulch is "planted" and thus requires a small hole to anchor the material.

Fencing and Rocks:

Fences may be necessary to cut off travel on closed routes when the route is too wide to be effectively disguised with vertical mulch or blocked by hay bales. Other barricades may consist of a row of large rocks and boulders to deter use. Placement of rocks requires no equipment and little or no soil disturbance is associated with their use. Large Boulders may be used occasionally in high non-compliance areas. These boulders may necessitate the use of heavy machinery (e.g. backhoe, small crane). Fencing in some areas may be used to deter impacts.

Soil Pitting:

Soil pitting, contours the soil to direct water flow and draw wind-blown seeds to focal spots on the ground. Pitting involves creating bowls approximately one to two feet in diameter and six inches deep. This practice creates favorable micro-sites in the bowls that may increase seed germination and small plant growth. In conjunction with pitting, shovels will be used to shave topsoil from under surrounding shrubs (plugging) and transfer the material to the pit hole. Pitting may need to be modified due to the sensitivity of the area. Divots in the soil may be a preferable alternative.

Rainfall Catchments

A rainfall catchment is an ancient method of irrigation used by indigenous peoples in arid environments. These V-shaped, earth or rock, water flow barriers reduce soil erosion and focus water flow on certain spots to aid initial plant recruitment.

Soil Imprinting

Soil imprinting entails raking small trenches to roughen the texture on surface soil and to collect wind-blown seed. Hand tools such as shovels and rakes are used.

Raking:

On closed routes and impacts formed by a single trespass (one person at one time) or routes without trampled vegetation or compacted soil, work crews shall rake, smooth (knock down berms) with the back of a rake, or sweep with a broom the top one inch of soil to hide evidence of tracks. Soils may also be contoured to match surrounding landscape, effectively camouflaging closed routes and impacts.

Terracing with Berms/Check dams:

To prevent the formation of gullies and disperse water to surrounding vegetation, workers may want to contour slopes of hill climb areas. Berms, rock check dams, or terraces slow and disperse water flow. Hand tools will be used to disturb the top one to six inches of soil.

Seeding:

Seed may be spread within rainfall catchments or soil pitting to accelerate natural regeneration. Raking underneath adjacent vegetation or collecting dried seedpods still attached to plants may collect seed. Broadcast seeding may also be done in highly denuded areas. Locally collected seeds will be used. Seeds should be collected from an area within 100 miles, 500 vertical feet, and two inches of annual precipitation of a restoration site. No more than ten percent of the seeds from one individual will be collected and multiple individuals will be harvested to guarantee genetic diversity.

Signing:

To help visitors to stay on designated routes BLM will maintain the route markers and repair or replace as necessary. Maintaining the route network is essential in the success of BLM restoration projects.

2.2 Mining Operations

The BLM oversees roughly 30 sand and gravel mining operations of various sizes, several small recreational mining claims, and one open-pit gold mine (Mesquite Mine) on BLM managed land within Imperial County. Occasionally the El Centro Field Office receives applications for mineral exploration activities for mining, geothermal and geophysical exploration.

Excavation, hauling and processing activities associated with mining, such as digging, loading trucks, crushing and screening all have the potential to produce fugitive dust, including PM₁₀ emissions unless adequate mitigation techniques are employed. Dust suppression measures, such as the application of water or fixatives, are generally employed as standard operating procedures, under the approved Plan of Operations required by the BLM. State law requires that all vehicles licensed for highway use be in compliance with specified vehicle emissions standards. Other emission controls may be required for off-highway equipment, such as loaders and bulldozers, and point sources of emissions such as diesel generators. Activities associated with exploration include construction and maintenance of temporary roads and drill pads and minor excavation activities. Fugitive dust and emissions controls for exploration activities are similar to those required for mineral production. Larger permanent and semi-permanent operations may be required to have a separate dust control plan approved by the county. Smaller, temporary operations, such as sand and gravel sales of a few thousand cubic yards may not need an emissions control plan approved by the county, but are required to employ dust control techniques on an as-needed basis.

2.3 Geothermal Power Plants

The El Centro Field Office oversees the lease for one Geothermal Power Plant Complex, Ormesa Geothermal Energy Plant, located on the East Mesa. The Geothermal Power Plant must conform to the following land use planning documents, as amended:

- California Desert Conservation Area (CDCA) Plan, adopted in 1980, as amended.
- EA-067-2006-12. Ormesa Geothermal Projects Continuing Geothermal Lease Operations East Mesa Known Geothermal Resource Area.
- Flat-tailed Horned Lizard Rangeland Management Strategy, 2003 as amended.

There are several unsurfaced access roads in the vicinity of the Ormesa Geothermal Power Plant. These roads are used to access pumps, pipelines and other geothermal facilities. Travel across these unsurfaced roads has the potential to produce fugitive dust and vehicle emissions. Other activities central to geothermal operations such as well pad construction and excavation have the potential to produce fugitive dust emissions, including PM₁₀, unless mitigation measures are taken.

The Imperial County Air Pollution Control District (ICAPCD) regulates stationary sources of air emissions within Imperial County, under both the California and federal Clean Air Acts. The ICAPCD has issued five active state authorities; Authorities to Construct, Permits to Operate, and one Federal Title V major source Permit to Operate to Ormesa which permits regular emission of geothermal gases and binary power plant working fluid. The ICAPCD permit and regulations also require the control of fugitive dust.

All operations would be conducted under Authority to Construct permits and Permits to Operate approved by the Imperial County Air Pollution Control District (ICAPCD). Ormesa has also committed that all disturbed areas within the operations area would be maintained in a manner to minimize dust, and that operations would comply with the applicable requirements of ICAPCD Rule 800 [“Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10)”]

[EA-067-2006-12, pg 4-7].

There are also several applications for geothermal energy leasing on BLM administered lands. BLM has not approved development of any of these leases at this point in time. If development is approved, the development would require analysis of potential air quality impacts and possibly the development of a dust control plan.

2.4 Miscellaneous Actions

Fugitive dust emissions may also be derived from miscellaneous actions that occur on public lands such as: driving to private property via BLM managed lands, rights-of-way for maintenance of power pole lines and canals, and new construction of pipelines.

These activities produce particulate matter mainly through the use of unpaved roads and use of heavy equipment and machinery during construction and maintenance projects.

3.0 Dust Control Measures

The following measures will be used singularly or in combination to prevent conditions conducive to fugitive dust emissions or to suppress airborne dust should it occur. Dust control measures are those measures that will be taken by the Bureau of Land Management, its lessees and permit holders, for any activity occurring on BLM owned and managed lands.

Potential dust control measures include, but are not limited to:

- Non-toxic stabilization of heavily used areas.
- Enforceable and posted speed limits in heavily used areas.
- Restoration of closed routes per BLM standards.
- Signage of Limited Use Areas to encourage OHV compliance.

Imperial County Air Pollution Control District Requirements and BLM's Plan to address the Requirement:

- Stipulate that all new authorizations for stationary emission sources obtain all necessary permits and satisfy all applicable SIP provisions, including project- or activity- specific BACM.

(BLM will advise applicants to contact the ICAPCD for appropriate permits and or Dust Plans.)

- A summary that: describes the total miles of BLM roads that are paved, paved with unpaved shoulders, and unpaved, including length and level of usage of each road; prioritize control of road segments based on annual and episodic (e.g. event) usage; describe the location and extent (e.g. acreage) of open areas disturbed by legal and illegal recreational use; prioritize control of these open areas based on annual and episodic (e.g. event) usage; describe plans for control of PM₁₀ emissions from these areas.

3.1 Summary of Roads and Routes of Travel

BLM currently manages only two paved roads, Gecko Road and Grays Well Road. Each of these roads are located within the Imperial Sand Dunes Recreation Area (ISDRA). Gecko Road is located in the Northern portion of the ISDRA, perpendicular to Highway 78, on the Western edge of the dunes (see map). Grays Well Road is located in the Southern portion of the ISDRA, parallel to Interstate 8 (see map). Gecko Road is approximately 6 miles long, and Grays Well Road is approximately 4.7 miles long.

BLM currently manages two aggregate roads. Both roads are located within the Imperial Sand Dunes Recreation Area (ISDRA). Wash Road begins at Highway 78 and extends South 5.0 miles to wash 25 (see map). The road parallels the existing Union Pacific Railroad right-of-way. Dune Buggy Flats Road begins at the east end of Gordons Well Road and extends .6 miles into Dune Buggy Flats.

Table 3.1 – Paved Roads Managed by BLM – El Centro Field Office

Name of Road	Mileage
Gecko Road	6 miles
Grays Well Road	4.7 miles
Total	10.7 miles

Table 3.2 – Aggregate Road Managed by BLM – El Centro Field Office

Name of Road	Mileage
Wash Road	5.0 miles
Dune Buggy Flats Road	.6 miles
Total	5.6 miles

BLM currently manages many off-highway trails or routes of travel in two distinct management areas known as the Northern and Eastern Colorado (NECO) management area and the Western Colorado (WECO) management area (see map). These areas are known as Limited Use areas so travel is limited to open routes of travel only, cross-country travel is prohibited. For this reason, the BLM considers the areas between open routes of travel to be closed to vehicle travel. There are approximately 1,178 miles of open routes and approximately 242 miles of “Limited” routes (open to street legal vehicles only) in the WECO management area. There are approximately 847 miles of open routes and approximately 317 miles of county roads in the NECO management area. Approximately 880,000 acres of the NECO management area falls within Imperial County, and approximately 475,000 acres of the WECO management area falls within Imperial County.

In addition to the limited use areas, BLM manages three Open Areas: Imperial Sand Dunes, Plaster City and Superstition Mountain (see map).

The location and extent of the Open Areas located within the El Centro Resource Area are as follows:

Table 3.3 – Acreage of Open Areas managed by BLM El Centro Field Office

Open Area Name	Approximate Acreage
Imperial Sand Dunes	83,252
Plaster City	28,240
Superstition Mountain	14,723
Total	126,216

Using the best available data, the best estimate of Off Highway Vehicle caused disturbance in the open areas range from 0 to 93 percent in the Imperial Sand Dunes Recreation Area (Excluding Wilderness and Administrative Closures) and about 8 to 99 percent in the Plaster City and Superstition Open Areas.

The data for the Imperial Sand Dunes Recreation Area was collected utilizing aerial imagery on Presidents Day weekend in 2006. Use on Presidents Day weekend represents one of the

highest visitation periods for the ISDRA and therefore represents an over estimation for most of the year. Also, the purpose of the study was to estimate vehicle use patterns in Peirson's Milk-vetch habitat and is therefore constrained by the sampling area boundaries.

The estimates for Superstition and Plaster City Open Areas are based on vehicle track evidence data collected in 2002. The data collected was in Flat-tailed horned lizard Management Areas (MAs) near the open areas. In the MAs, travel is limited to open routes of travel, cross-country travel is prohibited in these areas. The data collected in the MAs would under-estimate the level of disturbance in the open areas. In the open areas the highest level of disturbance would be expected at staging areas where the level of disturbance can approach 100%. Two methods were used to estimate disturbance, the first method utilized biologists walking transects and recording vehicle tracks. This method estimated that 8.5% of the surface of the Yuha Desert Flat-tailed horned lizard Management Area (MA) had vehicle tracks. The second method utilized black and white aerial photography and was conducted by the United States Fish and Wildlife Service (USFWS) in 2002. The estimate of disturbance in the Yuha Desert MA was 9.7% and the West Mesa MA was 8.0%.

The BLM estimates that none of the routes of travel located in Imperial County on public lands receive more than 50 vehicle trips per day. Certain unpaved areas located in the Imperial Sand Dunes, including Wash Road and Dune Buggy Flats access road receive more than 50 vehicle trips per day during holiday weekends (Halloween, Thanksgiving, New Year's and President's Day) that fall between the months of October and March. BLM will continue to water these areas to reduce dust emissions.

3.2 Plans for Control of PM₁₀

Many dust control measures are employed within the lands managed by El Centro Field Office. As referenced above, Gecko Road and Grays Well Road, located in the ISDRA, are paved roads. Since these roads receive high amounts of vehicle traffic during the cooler months of the year, the fact that they are paved will reduce dust emissions that may have arisen if they had not been paved. There are speed limit signs on both of these roads, which are rigorously enforced. A speed limit of 15 miles per hour is enforced on the new Wash Road to reduce dust emissions. Speed limits are also rigorously enforced within the entire ISDRA "within 50 feet of any campground, campsite, or concentration of people or animals" to 15 miles per hour. These measures also help to keep dust down, as they keep vehicle traffic decelerated.

Five administrative closures are currently in place in the Imperial Sand Dunes Recreation Area (see map). These closures total approximately 49,617 acres. While in place, these closures will also help to reduce PM₁₀ emissions in the ISDRA by limiting the area where vehicles are allowed.

Table 3.4 – Administrative Closures at Imperial Sand Dunes Recreation Area

Name of Closure	Approximate Acreage
Northern Closure	3,802
Central Closure #1	2,000
Central Closure #2	43,345
Patton Valley Closure	310
Southern Closure	160
Total	49,617 total acres closed at ISDRA

The BLM El Centro Field Office manages eight wilderness areas within Imperial County. These wilderness areas were designated by Congress and can be found on both the East and West sides of Imperial County. Travel within Federal Wilderness areas is limited to foot traffic and horseback riding. No motorized vehicles are allowed in Wilderness areas. A significant amount of land that may have produced PM₁₀ emissions is closed to vehicle traffic, since a total of approximately 196,082 acres of BLM managed lands in Imperial County are closed as Wilderness areas (see map).

Table 3.5 – Federal Wilderness Areas in Imperial County managed by BLM

Wilderness Area Name	Total Acres Closed
Fish Creek Mountains	20,575
Coyote Mountains	18,574
Jacumba	31,171
Palo Verde Mountains	21,149
Indian Pass	31,922
North Algodones Dunes	25,811
Picacho Peak	8,828
Little Picacho	38,052
Total	196,082 acres closed as Wilderness in Imperial County

Another mitigation measure to help control fugitive dust emissions from BLM lands is a seasonal closure on all routes within the Painted Gorge area from January 1 of each year to June 30th of each year. This seasonal closure takes place each year to protect the Federally Threatened Peninsular Bighorn Sheep (*Ovis canadensis*), and is an action that also lowers PM₁₀ emissions in the area. The Painted Gorge area is located West of the Plaster City Open area and North of Evan Hewes Highway.

Since 2003 the Bureau of Land Management (BLM), El Centro Field Office has restored 751 closed routes and illegal impacts within Imperial County. The 751 restored areas which cover 65.89 miles with an area of 1,189 acres. The closure and restoration of these routes should help reduce PM₁₀ emissions in the area by limiting the number of trails that vehicles are allowed to travel on. Wind erosion is also minimized when well-worn trails are restored to their natural state.

The BLM El Centro Field Office manages 14 Areas of Critical Environmental Concern within Imperial County (see map). ACECs are classified as Multiple USE Class L. These areas were set aside as areas that are valuable because of unique cultural, biological or scenic resources.

Table 3.6 – Acreages of Areas of Critical Environmental Concern in Imp. County

Name of ACEC	Approximate Acreage
Chuckwalla	262,202
Coyote Mountains Fossil Site	5,861
East Mesa	42,768
Gold Basin/Rand Intaglios	1,884
Indian Pass	1,764
Lake Cahuilla – A	1,231
Lake Cahuilla – B	2,528
Lake Cahuilla – C	5,592
Lake Cahuilla – D	4,723
North Algodones Dunes (also a Wilderness Area)	25,811
Pilot Knob	869
San Sebastian Marsh	7,680
West Mesa	20,294
Yuha Basin	71,847
Total	455,054

Control of dust emissions from certain roads and routes per the Classification of Wilderness in the California Desert Protection Act. As stated above, there are no authorized roads in BLM Wilderness Areas. All BLM Wilderness Areas are closed to all motor vehicle traffic. Foot traffic and horseback riding are the only modes of transportation allowed in BLM Wilderness Areas.

Control dust emissions from certain roads and routes as identified through general BLM planning. Certain unpaved areas located in the Imperial Sand Dunes, including Wash Road and the Dune Buggy Flats access road receive more than 50 vehicle trips per day during holiday weekends (Halloween, Thanksgiving, New Year's and President's Day) that fall between the months of October and March. BLM will continue to water these areas to reduce dust emissions.

Implement those PM_{10} control measures required to manage organized off-road events and/or competitions on public lands. BLM will require race organizers to submit a dust plan to the ICAPCD for review and approval prior to permitting of events. The race season is generally from September to June and is limited to the Imperial Sand Dunes, Plaster City and Superstition Mountain open areas.

Use BLM-standard road design and drainage specifications when maintaining existing roads or authorizing road maintenance and new road construction. BLM will require this for new road construction and existing road maintenance.

In addition to the design and land use planning mitigations, BLM will provide the following mitigations:

1. Include public educational information on PM₁₀ emissions with BLM open area literature and on information signs in heavily used areas.

BLM will distribute flyers provided by ICAPCD at the El Centro Field Office and at Ranger Stations.

3.3 Dust Control During Off Highway Vehicle Use

The BLM has agreed to apply the following dust control measures:

Treat the following access roads for dust control to reduce the impact of OHV activities on air quality:

1. Wash Road adjacent to the Union Pacific Railroad and Dune Buggy Flats Road.
2. Certain unpaved areas located in the Imperial Sand Dunes, including Wash Road and the Dune Buggy Flats access road receive more than 50 vehicle trips per day during holiday weekends (Halloween, Thanksgiving, New Years' and Presidents' Day) that fall between the months of October and February. BLM will continue to water these areas to reduce dust emissions.

In January 2003, the BLM approved and signed the Record of Decision (ROD) for the Western Colorado Deserts Routes of Travel Designations (WECO) and in December of 2002 the Record of Decision for the Northern and Eastern Colorado Desert Coordinated Management Plan (NECO) was signed. Both of these Decisions are amendments of the 1980 Bureau of Land Management California Desert Conservation Area (CDCA) Plan. In these plans, BLM set forth control measures to help curb PM₁₀ emissions.

As stated in the Western Colorado Desert Routes of Travel Designation (these are also true for the Northern and Eastern Colorado Routes of Travel Designation):

“There would be fewer roads designated as open than the current situation. There would be less miles of routes than existing conditions. The vehicle use limitation to street legal vehicles in the Yuha (and other areas) should result in a decrease in the use of this area. In addition to the designation of roads and the enforcement of the designation, land use should result in less off route travel. The off route travel creates new roads which increases the particulate matter emissions due to vehicular use and wind. This alternative also includes the mitigation requirement to restore closed roads to a natural desert landscape. This will result in fewer emissions due to the inability to easily use closed roads and the reduction in emissions due to wind.”

BLM is currently implementing this plan. Since 2003 the Bureau of Land Management (BLM), El Centro Field Office has restored 751 closed routes and unauthorized impacts within Imperial County totaling 65.89 miles of routes and 1,189 acres of public land. This restoration has returned the closed trails/routes to natural habitat and reduced the wind erosion for these areas.

3.4 Dust Control Within and During Mining Operations

BLM will require each commercial mining operation to work with the Imperial County APCD to develop a dust control plan that is specific to each mining operation. BLM requires compliance with all applicable air pollution laws in the approved Plan of Operations for all mining operations. This gives BLM the authority to order the operator to come into compliance. If this does not happen, BLM may issue a Notice of Non-Compliance and may ultimately shut down all or part of the operation and revoke the operator's bond.

3.5 Dust Control Within Geothermal Power Plants

The BLM will require the geothermal power plant to work with the Imperial County Air Pollution Control District to develop a dust control plan that is specific to the geothermal power plant, as required by the Imperial County Air Pollution Control District. Highway legal vehicles are required to employ appropriate state-mandated emissions controls.

3.6 Dust Control During Miscellaneous Construction Projects

Miscellaneous construction activities and general access activities tend to produce minimal fugitive dust emissions. Due to this, BLM will not request actions be made for private citizen right-of-ways unless the Imperial County Air Pollution Control District requests that they do so. For major construction projects, BLM will require the project coordinator to submit a dust plan to Imperial County Air Pollution Control District.